

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

GENOVA BURNS LLC

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In Re:

ROBERT H. SICKLES, et. al.,¹

Debtor-in-Possession.

Chapter 11

Case No.: 24-14781-CMG

Hearing Date: January 28, 2025 at
10:00am

NOTICE OF DEBTORS' FIRST OMNIBUS OBJECTION TO CLAIMS

TO: ALL PARTIES ON ANNEXED SERVICE LIST

PLEASE TAKE NOTICE that on the 28th day of January, 2025 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned as counsel to Robert H. Sickles and AHS Realty LLC (hereinafter "Debtors"), shall move before the Honorable Christine M. Gravelle, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, for the entry of an Order disallowing, reducing and expunging certain claims, and for such other and further relief as this Court deems just and proper.

¹ Robert H. Sickles' case is jointly administered with the case of AHS Realty LLC (24-14779)

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the Debtors' Objection filed in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, the legal bases upon which the Debtors rely are incorporated herein in the Omnibus Objection and do not raise any novel issues of law which would require a separate memorandum of law.

PLEASE TAKE FURTHER NOTICE, that oral argument is waived unless timely objections are filed.

PLEASE TAKE FURTHER NOTICE, that all objections to the relief requested must be filed in writing with the Clerk of the United States Bankruptcy Court, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, New Jersey 08608 and a copy must be simultaneously served upon Debtors counsel, Genova Burns LLC, Attn: Daniel M. Stolz, Esq. 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 so that such objections are received no later than seven (7) days prior to the return date set forth hereinabove.

PLEASE TAKE FURTHER NOTICE, that in the absence of any objections, the relief requested may be granted without further notice.

GENOVA BURNS, LLC
Counsel for the Debtors-in-Possession

Dated: December 27, 2024

By: /s/ Jaclynn N. McDonnell
Jaclynn N. McDonnell, Esq.

